

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court  
Southern District of Texas

FILED

## UNITED STATES DISTRICT COURT

JUL 10 2016

for the

Southern District of Texas

Clerk of Court

United States of America )

v. )

Oscar Manuel Flores-Lopez )

YOB: 1970 )

Citizenship: Mexico )

Case No. M-16-1300-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 9, 2016 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21USC841 &amp; 21USC952

defendant did knowingly and intentionally possess with the intent to distribute approximately 17.18 kilograms of cocaine, a Schedule II controlled substance and did knowingly and intentionally import into the United States from the United Mexican States approximately 17.18 kilograms of cocaine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

On July 9, 2016, a white 2011 Nissan Altima, displaying Nuevo Leon, Mexico license plate; STK-49-85, entered the United States from the United Mexican States at the Anzalduas Port of Entry. The vehicle was driven by Oscar Manuel FLORES-Lopez. FLORES is a Mexican national, who possesses a B1/B2 visa, also known as a border crossing card.

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.



Complainant's signature

Andrew Bowman, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 7/10/2016

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Dorina Ramos

Printed name and title

### **Attachment "A"**

FLORES was accompanied by his wife, juvenile son, and mother-in-law.

At primary inspection, Customs and Border Protection Officer (CBPO) J. Sandoval received a negative declaration for prohibited items from FLORES and the other occupants. FLORES stated they were traveling to the McAllen, TX area to go shopping. CBPO J. Sandoval observed TECS records associating FLORES and the vehicle to possible narcotics smuggling. CBPO J. Sandoval referred FLORES, other occupants, and the vehicle to secondary inspection.

At secondary inspection, CBPO E. Jimenez received another negative declaration for prohibited items from FLORES and the other occupants. CBPO E. Jimenez advised FLORES stated he and his family were traveling to the McAllen, TX area to go shopping. The vehicle was scanned through the Z-Portal and anomalies were discovered in the front and rear seats. CBPO E. Ponce and his narcotics detection dog (NDD) conducted an open air search of the vehicle and the NDD provided a positive alert for the odor of narcotics near the rear seats of the vehicle. A total of fifteen (15) packages were removed from the vehicle's front and rear seats. The packages were probed and the white powdery substance field-tested positive for cocaine. The total weight of all 15 packages was 17.18 kilograms.

Homeland Security Investigations (HSI) Special Agent (SA) Andrew Bowman responded to the port of entry with HSI Task Force Officer (TFO) Eric Austin. FLORES was provided his Miranda rights from a pre-printed form in Spanish by TFO Austin. FLORES stated that he understood his rights and agreed to answer questions. FLORES admitted to knowing the vehicle contained cocaine and he was going to be paid \$5,000 USD for delivering the narcotics to unknown individuals in the United States.